

Senator Edward Meyer
Representative Richard Roy
Members of the Environment Committee

February 8, 2011

Dear Senator Meyer, Representative Roy and Members of the Environment Committee,

My name is Michael Bartlett. I am the head forester for Hull Forest Products. I serve as a representative of the forest industry on the CT DEP Forest Practices Advisory Board.

I would like to express my reservations with the language of R.B.832, AN ACT CONCERNING THE PROTECTION OF INLAND WETLANDS AND WATERCOURSES. Those concerns are related to the scientific practice of forestry and how currently some Inland Wetland Commissions view the practice of forestry as a commercial activity rather than an agricultural activity, despite it being defined as an agricultural activity by state statute and CT DEP.

Although Sec. 3 of R.B. 832 states under definitions that "regulated activities does not include those under Sec.22a-40" (permitted as of right), there are some commissions that have not found any forestry activities in their town permitted as of right, which is clearly in violation of state statutes and court precedence. My concern is in the interpretation of R.B.832 with regard to the practice of forestry and the potential negative impact that it could have on forestry and small private forest landowners with increased cost and regulatory burden. The practice of forestry is by far the most benign form of agriculture practiced here in CT. Most forestry operations are conducted on 10-25 year intervals. The benefits provided to society by the practice of forestry are numerous.

The premise for this bill may be valid. However, current state statutes and individual town regulations are already more than adequate to provide the desired protection. If there is a real need for this bill, which I would argue that there is not, then it should be amended to specifically state that the most desired land use, forestry, is a permitted as of right activity and therefore exempt from being considered a regulated activity under R.B.832.

If the legislature was serious about promoting the need for protecting inland wetlands and water courses they might want to consider a requirement of training for Inland Wetland Commission members and their agents. I believe that requiring education and training of Inland Wetland Commission members and their agents would provide better protection for wetlands and water courses, than additional regulations such as R.B.832.

Sincerely,
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Forest Resources Manager

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